

SHAIN SCHAFFER P.C.
150 MORRISTOWN ROAD-SUITE 105
BERNARDSVILLE, NEW JERSEY 07924
Telephone: (908) 953-9300
Facsimile: (908) 953-2969
Marguerite M. Schaffer, Esq.
Attorney ID No.: 017041975
Attorneys for Plaintiff
JP Morgan Chase Bank, N.A.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

IN RE: KRISTA FRANCES SELIG, Debtor.	Case No.: 8-17-70042-REG Chapter 7
JP MORGAN CHASE BANK, NA Plaintiff, Vs. KRISTA FRANCIS SELIG, Defendant.	Adversary Proceeding No.: COMPLAINT FOR DETERMINATION OF DISCHARGEABILITY PURSUANT TO SECTION 523 OF THE BANKRUPTCY CODE

JP Morgan Chase Bank, N.A. ("Chase"), a national banking association, having its principal place of business at 270 Park Avenue, New York, New York, by way of Complaint against the Defendant-Debtor Krista Frances Selig ("Debtor" or "Defendant"), says:

JURISDICTION

1. On January 5, 2017, the debtor filed a voluntary petition ("Petition") for relief under Chapter 7 of Title 11 of the United States Bankruptcy Code ("Bankruptcy Code") in the United States Bankruptcy Court for the Eastern District of New York.
2. The debtor's duly noticed meeting of creditors scheduled pursuant to Section 341 (a) of the Bankruptcy Code was adjourned from February 9, 2017, to March 7, 2017 and

then again to April 5, 2017.

3. As of the date of this complaint the Debtor has not been granted a discharge.
4. This Complaint is timely because the date by which a Complaint to determine dischargeability of a debt has not passed, and currently expires on April 10, 2017, pursuant to the Notice of Chapter 7 Bankruptcy Case.
5. This is an adversary proceeding in which the plaintiff-creditor seeks a determination as to the dischargeability of the debt owed by the Debtor to plaintiff under Bankruptcy Code §§ 523 (a) (2) (A), 523(a) (4), and 523 (a) (6).
6. The Court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. § 1334 and Bankruptcy Code §§ 523 and 727.
7. This case is a core proceeding pursuant to 28 U.S.C. §§ 157(b)(2)(I) and 157(b)(2)(J).

PARTIES

8. Plaintiff, JP Morgan Chase Bank, N.A., is a national banking association, having its principal place of business at 270 Park Avenue, New York, New York.
9. Defendant-Debtor, Krista Selig, resides at 137 Powerhouse Road 4W, Roslyn Heights, New York 11743.
10. At all times relevant to this action, Defendant-Debtor Krista Selig was an attorney at law of the State of New York and was acting in a fiduciary capacity with regard to transactions on behalf of Hawthorne Capital Corp. concerning Chase loan funds.

PLAINTIFF'S STATE COURT SUIT AGAINST THE DEFENDANT

11. On September 16, 2010, Plaintiff initiated a Civil Action against Debtor, among others, in the Superior Court of New Jersey seeking damages for several million dollars in losses sustained by Chase as a result of the complicity of Debtor, while

acting in a fiduciary capacity as attorney at law, in an elaborate criminal enterprise with other actors, in Chase v. Hawthorne Capital Corp., et. als. , Docket No. MON-L-4617-10 ("Chase v Hawthorne"). An amended complaint was filed December 10, 2010. A Second Amended Complaint was filed November 19, 2012. On September 12, 2013 a Third Amended Complaint was filed.

12. Debtor was criminally indicted for her involvement in the scheme to defraud Chase, in Monmouth County Indictment No. 11-06-1195, and therein charged with conspiracy to commit theft, a felony. The offense charged pursuant to N.J.S.A. 2C: 5-2 and N.J.S.A. 2C: 20-3 carried a maximum sentence of five (5) years imprisonment.
13. On or about March 29, 2012, Debtor pled guilty to conspiracy to commit theft in the third degree for which she was sentenced to a non-custodial sentence of one (1) year probation, in exchange for her assistance in the prosecution of the other criminal defendants. Attached Exhibit "A" [Indictment No. 11-06-1195 and Guilty Plea Memorandum of Understanding].
14. On November 30, 2016, defaults having been entered as to the defendants Hawthorne Capital Corp., Hawthorne Abstract, Frederick Tropeano, Silvano Tropeano, John Kosta, and Krista Selig, a proof hearing on Chase v. Hawthorne was held before the Honorable Jamie S. Perri, J.S.C., Monmouth County Superior Court, to establish the liability of the defendants and corresponding damages sustained by Chase.
15. On November 30, 2016, the Honorable Judge Perri, found sufficient evidence to warrant judgment as to defendants Hawthorne Capital Corp., Frederick Tropeano, and John Kosta in the amount of \$2,684,682.79, and left the record open for receipt of corroborating evidence as to the guilty pleas and convictions of Krista Selig and

Silvano Tropeano. The supporting evidence was submitted to the Court on December 19, 2016. Final disposition, based on the factual findings of November 30, 2016, was entered on March 21, 2017 awarding treble damages under New Jersey Civil RICO pursuant to N.J.S.A. 2C:41-4(c). Thus, total damages awarded against the Debtor amount to \$8,054,048.10. Attached Exhibit "B" [Default Judgment].

**COUNT I—NON-DISCHARGEABILITY OF DEBT UNDER SECTION 523
(a)(2)(A) OF THE BANKRUPTCY CODE**

16. Plaintiff repeats and realleges the allegations set forth in paragraphs 1 through 14 of this Complaint as if fully set forth at length herein.

17. Bankruptcy Code § 523 (a)(2)(A) provides in pertinent part, that:

(a) A discharge under section 727,...of this title does not discharge an individual debtor from any debt –

(2) ...for money...to the extent obtained by –

(A)...false pretenses, a false representation, or actual fraud...

17. All or part of the debt owed to plaintiff is non-dischargeable as it is a debt for money that was obtained by false pretenses, false representations, or actual fraud within the meaning of Bankruptcy Code § 523 (a)(2)(A), as evidenced by the guilty plea for conspiracy to commit theft and the judgment entered against the Debtor in Chase v. Hawthorne.

**COUNT II—NON-DISCHARGEABILITY OF DEBT UNDER SECTION 523 (a)(4)
OF THE BANKRUPTCY CODE**

18. Plaintiff repeats and realleges the allegations set forth in paragraphs 1 through 17 of this Complaint as if fully set forth at length herein.

19. Bankruptcy Code § 523 (a)(4) provides, in relevant part, that:

(a) A discharge under section 727... of this title does not discharge an individual debtor from any debt—

(4) for fraud or defalcation while acting in a fiduciary capacity, embezzlement, or larceny....

20. All or part of the debt owed to plaintiff is non-dischargeable as it is a debt for fraud or defalcation while acting in a fiduciary capacity, or larceny within the meaning of Bankruptcy Code § 523 (a)(4), as evidenced by the guilty plea for conspiracy to commit theft and the judgment entered against the Debtor in Chase v. Hawthorne.

COUNT III—NON-DISCHARGEABILITY OF DEBT UNDER SECTION 523 (a)(4) OF THE BANKRUPTCY CODE

21. Plaintiff repeats and realleges the allegations set forth in paragraphs 1 through 20 of this Complaint as if fully set forth at length herein.

22. Bankruptcy Code § 523 (a)(6) provides in relevant part, that :

(a) A discharge under section 727... of this title does not discharge an individual debtor from any debt—

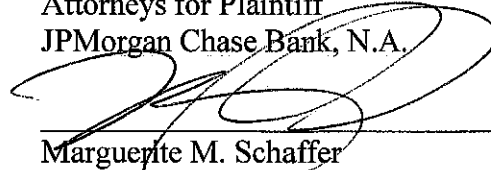
(6) or willful and malicious injury by the debtor to another entity or the property of another entity...

23. All or part of the debt owed to plaintiff is non-dischargeable as it is a debt for willful and malicious injury caused by the debtor within the meaning of Bankruptcy Code § 523 (a)(6), as evidenced by the guilty plea for conspiracy to commit theft and the judgment entered against the Debtor in Chase v. Hawthorne.

WHEREFORE, Plaintiff respectfully requests that this Court enter a Judgment determining that the debt to Plaintiff against the Debtor is non-dischargeable under Bankruptcy Code §§ 523 (a)(2)(A), 523 (a)(4), and 523 (a)(6) and granting Plaintiff such other and further relief as this Court may deem just and proper.

Dated: **March 28, 2017**

SHAIN SCHAFFER P.C.
Attorneys for Plaintiff
JPMorgan Chase Bank, N.A.

A large, stylized handwritten signature in black ink, appearing to read 'MS', is written over a horizontal line.

Marguerite M. Schaffer
150 Morristown Road, Suite 105
Bernardsville, New Jersey 07924

872 Madison Avenue, Suite 2A
New York, New York 10021

EXHIBIT A

MONMOUTH COUNTY PROSECUTOR
132 JERSEYVILLE AVENUE
FREEHOLD, NEW JERSEY 07728

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION (CRIMINAL)
MONMOUTH COUNTY

INDICTMENT No. 11-06-01195-I

STATE OF NEW JERSEY

Plaintiff,

v.

DEMAND FOR
BILL OF PARTICULARS
WHERE ALIBI IS RELIED
UPON BY DEFENDANT

FREDERICK D. TROPEANO, a/k/a
"DON TROPEANO", a/k/a
"FREDRICK D. TROPEANO",
SILVANO TROPEANO,
ELEKTRA TROPEANO, a/k/a
"ELEKTRA MANGAS",
PAUL VOLTAIRE
JOHN KOSTA,
KRISTA F. SELIG and
HARRY VOLTAIRE,

Defendants.

TO Frederick D. Tropeano, a/k/a
"Don Tropeano", a/k/a
"Fredrick D. Tropeano" DOB 01/21/1966

214 Holland Road

Holmdel, New Jersey 07733

PURSUANT TO R. 3:12-2,

If you, the defendant in this case, in any way intend to rely on the defense of alibi, the State demands that within ten (10) days after receipt of this written demand, you furnish to the State a written bill of particulars, signed by you, the defendant, stating the specific place or places at which you claim to have been at the time of the alleged offense and the names and addresses of the witnesses upon whom you wanted to rely to establish your alibi.

DATED June 27, 2011
10-03528



Monmouth County Prosecutor

MONMOUTH COUNTY PROSECUTOR
132 JERSEYVILLE AVENUE
FREEHOLD, NEW JERSEY 07728

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION (CRIMINAL)
MONMOUTH COUNTY

INDICTMENT No.

STATE OF NEW JERSEY :

Plaintiff, :

v. :

DEMAND FOR
BILL OF PARTICULARS
WHERE ALIBI IS RELIED
UPON BY DEFENDANT

FREDERICK D. TROPEANO, a/k/a :

"DON TROPEANO", a/k/a :

"FREDRICK D. TROPEANO", :

SILVANO TROPEANO, :

ELEKTRA TROPEANO, a/k/a :

"ELEKTRA MANGAS", :

PAUL VOLTAIRE :

JOHN KOSTA, :

KRISTA F. SELIG and :

HARRY VOLTAIRE, :

.....
Defendants. :

TO Silvano Tropeano DOB 05/09/1944
.....

322 77th Street 3B
.....

Brooklyn, New York 11209
.....

PURSUANT TO R. 3:12-2,

If you, the defendant in this case, in any way intend to rely on the defense of alibi, the State demands that within ten (10) days after receipt of this written demand, you furnish to the State a written bill of particulars, signed by you, the defendant, stating the specific place or places at which you claim to have been at the time of the alleged offense and the names and addresses of the witnesses upon whom you wanted to rely to establish your alibi.

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"FREDRICK D. TROPEANO", :
SILVANO TROPEANO, :
ELEKTRA TROPEANO, a/k/a :
"ELEKTRA MANGAS", :
PAUL VOLTAIRE :
JOHN KOSTA, :
KRISTA F. SELIG and :
HARRY VOLTAIRE, :

Defendants. :

TO Elektra Tropeano a/k/a :
"Elektra Mangas" : DOB 04/13/1970

214 Holland Road

Holmdel, New Jersey 07733

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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION (CRIMINAL)
MONMOUTH COUNTY

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"FREDRICK D. TROPEANO", :

SILVANO TROPEANO, :

ELEKTRA TROPEANO, a/k/a :

"ELEKTRA MANGAS", :

PAUL VOLTAIRE :

JOHN KOSTA, :

KRISTA F. SELIG and :

HARRY VOLTAIRE, :

.....
Defendants. :

TO

Paul Voltaire DOB 02/12/1971

649 East 79th Street

Brooklyn, New York 11236

PURSUANT TO R. 3:12-2,

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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION (CRIMINAL)
MONMOUTH COUNTY

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SILVANO TROPEANO, :

ELEKTRA TROPEANO, a/k/a :

"ELEKTRA MANGAS", :

PAUL VOLTAIRE :

JOHN KOSTA, :

KRISTA F. SELIG and :

HARRY VOLTAIRE, :

Defendants. :

TO

John Kosta

DOB 10/15/1970

1075 77th Street

Brooklyn, New York 11236

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MONMOUTH COUNTY

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SILVANO TROPEANO, :

ELEKTRA TROPEANO, a/k/a :

"ELEKTRA MANGAS", :

PAUL VOLTAIRE :

JOHN KOSTA, :

KRISTA F. SELIG and :

HARRY VOLTAIRE, :

.....
Defendants. :

TO

Krista F. Selig

DOB 08/13/1971

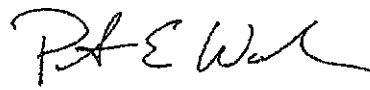
.....
649 East 79th Street

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Brooklyn, New York 11236

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DATED June 27, 2011.....
10-03528



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132 JERSEYVILLE AVENUE
FREEHOLD, NEW JERSEY 07728

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION (CRIMINAL)
MONMOUTH COUNTY

INDICTMENT No.

STATE OF NEW JERSEY :

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UPON BY DEFENDANT

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"FREDRICK D. TROPEANO", :

SILVANO TROPEANO, :

ELEKTRA TROPEANO, a/k/a :

"ELEKTRA MANGAS", :

PAUL VOLTAIRE :

JOHN KOSTA, :

KRISTA F. SELIG and :

HARRY VOLTAIRE, :

Defendants. :

TO Harry Voltaire DOB 02/02/1967

974 81st Street

Brooklyn, New York 11236

PURSUANT TO R. 3:12-2,

If you, the defendant in this case, in any way intend to rely on the defense of alibi, the State demands that within ten (10) days after receipt of this written demand, you furnish to the State a written bill of particulars, signed by you, the defendant, stating the specific place or places at which you claim to have been at the time of the alleged offense and the names and addresses of the witnesses upon whom you wanted to rely to establish your alibi.

DATED June 27, 2011
10-03528



Monmouth County Prosecutor

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION (CRIMINAL)
MONMOUTH COUNTY

THE STATE OF NEW JERSEY :

Plaintiff, :

v. :

Indictment No.

Case No. 10-03528

FREDERICK D. TROPEANO, a/k/a :

"DON TROPEANO", a/k/a :

"FREDRICK D. TROPEANO", :

SILVANO TROPEANO, :

ELEKTRA TROPEANO, a/k/a :

"ELEKTRA MANGAS", :

PAUL VOLTAIRE :

JOHN KOSTA, :

KRISTA F. SELIG and :

HARRY VOLTAIRE, :

Defendants.

FIRST COUNT

FINANCIAL FACILITATION OF CRIMINAL ACTIVITY

FIRST DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about and between January 1, 2008 and July 21, 2010, in or about the Township of Holmdel and/or the Township of Manalapan and/or the Township of Aberdeen, County of Monmouth, and elsewhere within the jurisdiction of this Court, did commit the crime of Financial Facilitation of Criminal Activity, by engaging in transactions involving property valued in an excess of \$500,000, with knowledge that it was, or which a reasonable person would believe to be, derived from criminal activity, with the intent to facilitate or promote the criminal

activity, and/or knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, and/or directed, organized, financed, planned, managed, supervised, or controlled the transportation of or transactions in property known or which a reasonable person would believe to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25, and against the peace of this State, the Government, and dignity of the same.

SECOND COUNT

CONSPIRACY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about and between January 1, 2008 and July 21, 2010, in or about the Township of Holmdel and/or the Township of Manalapan and/or the Township of Aberdeen, County of Monmouth, and elsewhere within the jurisdiction of this Court, did commit the crime of Conspiracy, by unlawfully agreeing with each other that they, or any one or more of them, would commit the crime of Financial Facilitation of Criminal Activity, with the purpose of promoting or facilitating the commission of said crime, contrary to the provisions of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:21-25, and against the peace of this State, the Government, and dignity of the same.

THIRD COUNT

FINANCIAL FACILITATION OF CRIMINAL ACTIVITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and ELEKTRA TROPEANO, a/k/a "ELEKTRA MANGAS", on or about July 21, 2010, in or about the Township of Holmdel, County of Monmouth, and elsewhere within the jurisdiction of this Court, did commit the crime of Financial Facilitation of Criminal Activity, by engaging in transactions involving property valued in an excess of \$75,000 but less than \$500,000, with knowledge that it was, or which a reasonable person would believe to be, derived from criminal activity, with the intent to facilitate or promote the criminal activity, and/or knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, and/or directed, organized, financed, planned, managed, supervised, or controlled the transportation of or transactions in property known or which a reasonable person would believe to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25, and against the peace of this State, the Government, and dignity of the same.

FOURTH COUNT

CONSPIRACY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and ELEKTRA TROPEANO, a/k/a "ELEKTRA MANGAS", on or about July 21, 2010, in or about the Township of Holmdel, County of Monmouth, and elsewhere within the jurisdiction of this Court, did commit the crime of Conspiracy, by unlawfully agreeing with each other that they, or any one or more of them, would commit the crime of Financial Facilitation, with the purpose of promoting or facilitating the commission of said crime, contrary to the provisions of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:21-25, and against the peace of this State, the Government, and dignity of the same.

FIFTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about July 24, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful

control over, movable property belonging to Hina Bhuchara and/or Seaside Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

SIXTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about and between October 5, 2007 through October 20, 2008, in or about the Township of Holmdel and/or the Township of Manalapan and/or the Township of Aberdeen, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Lorraine Boykin and/or OneWest Bank and/or Indymac Federal Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

SEVENTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK

TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and HARRY VOLTAIRE, on or about March 26, 2008, in or about the Township of Holmdel and/or the Township of Manalapan and/or the Township of Aberdeen, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Marie Cazeau and/or Chase Bank and/or First Horizon and/or First Tennessee Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

EIGHTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about February 2, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Matthew Coffey and/or Bank of America and/or Gateway Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

NINTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about March 9, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Constantino Cortez and/or Amalgamated Bank and/or Chase Bank and/or Gateway Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

TENTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about March 20, 2009, in or about the Township of Holmdel and/or the Township of Manalapan and/or the Township of Aberdeen, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable

property belonging to Diego Cue and/or PNC Bank and/or Bank of America, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

ELEVENTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about March 11, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Harvey Denison and/or Bank of America and/or Gateway Bank and/or Chase Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

TWELFTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO",

and SILVANO TROPEANO, on or about March 26, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Ferdinand Frangiosa and/or GMAC Bank and/or Gateway Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

THIRTEENTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about April 14, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Alexandra Giraldo and/or CitiMortgage and/or Gateway Bank and/or Chase Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

FOURTEENTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about December 24, 2009, in or about the Township of Holmdel and/or and or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to U.S. Bank and/or Bank of America to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

FIFTEENTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about March 26, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Mary Kortenhaus and/or Flagstar Bank and/or Stearns Lending and/or Bank of

America, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

SIXTEENTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about July 9, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to WCS Lending and/or Texas Capital Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

SEVENTEENTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about March 25, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of

Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Paul Lowell and/or GMAC Bank and/or MLD Mortgage, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

EIGHTEENTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about February 27, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Ayad Najadeh and/or GMAC Bank and/or Chase Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

NINETEENTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK

TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about February 8, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Anthony Newell and/or GMAC Bank and/or Wells Fargo and/or Chase Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

TWENTIETH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about June 11, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Robert Neusch and/or Bank of America and/or WCS Lending and/or Texas Capital Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

TWENTY FIRST COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about March 23, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Leland Penaranda and/or Wells Fargo Bank and/or Gateway Bank and/or Chase Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

TWENTY SECOND

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about March 15, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Eriberto Ramon and/or

OneWest Bank and/or Gateway Bank and/or Chase Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

TWENTY THIRD

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about May 3, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Nobel Rentas and/or Bank of America and/or Gateway Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

TWENTY FOURTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about June 15, 2010, in or about the

Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Joseph Rotonda and/or Bank of America and/or WCS Lending and/or Texas Capital Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

TWENTY FIFTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about October 8, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Richard Shen and/or Bank of America and/or Flagstar Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

TWENTY SIXTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about and between October 26, 2009 and November 18, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Rubidia Sibrian and/or Chase Bank and/or GMAC Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

TWENTY SEVENTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about June 25, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Richard Smith and/or

Bank of America, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

TWENTY EIGHTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about June 25, 2009, in or about the Township of Holmdel and the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Hamid Ullah and/or Wells Fargo Bank and/or Gateway Bank and/or Chase Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

TWENTY NINTH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about March 11, 2010, in or about the

Township of Holmdel and/or the Township of Manalapan and/or Aberdeen, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Christopher Willett and/or Wells Fargo Bank and/or Gateway Bank and/or Chase Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

THIRTIETH COUNT

THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about April 7, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to John Zofrea and/or Chase Bank and/or Gateway Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

THIRTY FIRST COUNT

THEFT

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about November 23, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property belonging to Kevin Sharp, to wit: U.S. currency valued at over \$500, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

THIRTY SECOND

CONSPIRACY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, PAUL VOLTAIRE, KRISTA F. SELIG, JOHN KOSTA and HARRY VOLTAIRE, on or about January 1, 2008 to present within the Township of Holmdel and/or the Township of Manalapan and/or the Township of Aberdeen, County of Monmouth, and elsewhere within the jurisdiction of this Court, did commit the crime of Conspiracy, by unlawfully agreeing with each other that they, or

any one or more of them, would commit the crime of Theft, with the purpose of promoting or facilitating the commission of said crime, contrary to the provisions of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

THIRTY THIRD

ATTEMPTED THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about June 7, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property belonging to Phyllis Atkinson and/or Gateway Bank and/or Wells Fargo Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

THIRTY FOURTH

ATTEMPTED THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO",

and SILVANO TROPEANO, on or about December 21, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property belonging to Kenyatta Brandt and/or Ally Bank and/or Bank of America, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

THIRTY FIFTH COUNT

ATTEMPTED THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about September 3, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property belonging to Eric Gilkie and/or Flagstar Bank and/or Pinnacle FCU, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

THIRTY SIXTH COUNTATTEMPTED THEFTSECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about February 24, 2010, in or about the Townships of Holmdel and/or Manalapan, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property belonging to Glenn Godfrey and/or Gateway Bank and/or Chase Bank and/or PNC Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

THIRTY SEVENTH COUNTATTEMPTED THEFTSECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about March 17, 2010, in or about the Townships of Holmdel and/or Manalapan, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property belonging to Lisa Kunin-

Simpson and/or Gateway Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

THIRTY EIGHTH COUNT

ATTEMPTED THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about November 20, 2008, in or about the Townships of Holmdel and/or Manalapan and/or Aberdeen, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property belonging to Patricia Lane and/or Bank of America, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof; contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

THIRTY NINTH COUNT

ATTEMPTED THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO",

and SILVANO TROPEANO, on or about March 2, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property belonging to Shelley Reed Logan and/or OCWEN Financial Corporation and/or Gateway Bank and/or Chase Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

FORTIETH COUNT

ATTEMPTED THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about July 23, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property belonging to Anthony Lombardi and/or Taylor, Bean and Whitaker Mortgage Corp. and/or Manasquan Savings Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

FORTY FIRST COUNT

ATTEMPTED THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about December 16, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property belonging to Thomas Magg and/or Chase Bank and/or Citibank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

FORTY SECOND

ATTEMPTED THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about July 10, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property belonging to

Michael Miglin and/or Taylor, Bean and Whitaker Mortgage Corp. and/or Wells Fargo Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

FORTY THIRD COUNT

ATTEMPTED THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about October 30, 2009, in or about Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property belonging to Hazel Nunez and/or Wells Fargo Bank and/or Ally Bank to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

FORTY FOURTH COUNT

ATTEMPTED THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK

TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about November 12, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property belonging to Luis Oyola and/or Ally Bank and/or GMAC Bank and/or Bank of America, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

FORTY FIFTH COUNT

ATTEMPTED THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about December 4, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property belonging to Corey Romanack and/or Ally Bank and/or GMAC, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

FORTY SIXTH COUNT

ATTEMPTED THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about November 13, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property belonging to Katherine Sideris and/or SunTrust Bank and/Flagstar Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

FORTY SEVENTH COUNT

ATTEMPTED THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about December 14, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property

belonging to Darshan Singh and/or Ally Bank and/or First Tennessee Bank, to wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

FORTY EIGHTH COUNT

ATTEMPTED THEFT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", and SILVANO TROPEANO, on or about July 22, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Theft, by attempting to unlawfully take, or exercise unlawful control over, movable property belonging to Timothy Webster and/or Taylor, Bean and Whitaker Mortgage Corp. and/or Chase Bank, wit: U.S. currency valued at over \$75,000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:20-3, and against the peace of this State, the Government, and dignity of the same.

FORTY NINTH COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO",

SILVANO TROPEANO and JOHN KOSTA, on or about February 2, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: Matthew Coffey and/or Gateway Bank and/or Chase Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

FIFTIETH COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about March 9, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: Constantino Cortez and/or Chase Bank and/or New

Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

FIFTY FIRST COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about March 11, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: Harvey Denison and/or Gateway Bank and/or Chase Bank and/or New Jersey Title Insurance company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

FIFTY SECOND COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO",

SILVANO TROPEANO and JOHN KOSTA, on or about March 26, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: Ferdinand Frangiosa and/or Gateway Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

FIFTY THIRD COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about April 14, 2010, in or about Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud

another, to wit: Alexandra Giraldo and/or Gateway Bank and/or Chase Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

FIFTY FOURTH COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about March 26, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: Mary Kortenhaus and/or Bank of America and/or Stearns Lending and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

FIFTY FIFTH COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK

TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDERICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about March 25, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: Paul Lowell and/or MLD Mortgage and/or Bank of America and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

FIFTH SIXTH COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about February 27, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure

or defraud another, to wit: Ayad Najadeh and/or Chase Bank, and/or Chase Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

FIFTY SEVENTH COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about February 8, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: Anthony Newell and/or Wells Fargo and/or Chase Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

FIFTY EIGHTH COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK

TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about March 23, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: Leland Penaranda and/or Gateway Bank and/or Chase Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

FIFTY NINTH COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about March 15, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure

or defraud another, to wit: Eriberto Ramon and/or Gateway Bank and/or Chase Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

SIXTIETH COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about June 25, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: Hamid Ullah and/or Gateway Bank and/or Chase Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

SIXTY FIRST COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK

TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about March 11, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: Christopher Willett and/or Gateway Bank and/or Chase Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

SIXTY SECOND COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about April 7, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud

another, to wit: John Zofrea and/or Chase Bank and/or Gateway Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

SIXTY THIRD COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about February 24, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: Glenn Godfrey and/or Gateway Bank and/or Chase Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

SIXTY FOURTH COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK

TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about March 17, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: Lisa Kunin-Simpson and/or Gateway Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

SIXTY FIFTH COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about March 2, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Roman Grutman, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud

another, to wit: Shelley Reed Logan and/or OCWEN Financial Corporation and/or Gateway Bank and/or Chase Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

SIXTY SIXTH COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about July 9, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Erica Gomez, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: WCS Lending and/or Texas Capital Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

SIXTY SEVENTH COUNTIMPERSONATION - THEFT OF IDENTITYSECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about June 11, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Erica Gomez, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: Robert Neusch and/or Bank of America and/or WCS Lending and/or Texas Capital Bank and/or Wells Fargo Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

SIXTH EIGHTH COUNTIMPERSONATION - THEFT OF IDENTITYSECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about May 3, 2010, in or about the Township of Holmdel and/or the Township of Manalapan,

County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Erica Gomez, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: Nobel Rentas and/or Bank of America and/or Gateway Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

SIXTY NINTH COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about June 15, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Erica Gomez, Esq. and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: Joseph Rotonda and/or Bank of America and/or WCS Lending and/or Texas Capital Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-

17a(1), and against the peace of this State, the Government, and dignity of the same.

SEVENTIETH COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about July 9, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Daniel Lefante, and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: WCS Lending and/or Texas Capital Bank and/or New Jersey Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

SEVENTY FIRST COUNT

IMPERSONATION - THEFT OF IDENTITY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about July 9, 2010, in or

about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Marsha Connell, and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: U.S. Bank and/or Bank of America and/or Stewart Title Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

SEVENTY SECOND COUNT

IMPERSONATION - THEFT OF IDENTITY

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that HARRY VOLTAIREH, on or about July 9, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Impersonation - Theft of Identity, by impersonating another or assuming a false identity, to wit: Claudine Phillips, CPA, and acting in such assumed character or false identity for the purpose of obtaining a pecuniary benefit of a value of over \$75,000, or with the purpose to injure or defraud another, to wit: contrary to the provisions of N.J.S.A. 2C:21-17a(1), and against the peace of this State, the Government, and dignity of the same.

SEVENTY THIRD COUNT

FORGERY

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO, and JOHN KOSTA on or about December 24, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Forgery, by, with purpose to defraud or injure another, to wit: Marcia Gonnell and/or Bank of America and/or Stewart Title Company, making, completing, executing, authenticating, issuing or transferring, a writing, to wit: a HUD-1 form and mortgage refinance documents, so that they purported to be the act of Marcia Gonnell who did not authorize that act, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the Government, and dignity of the same.

SEVENTY FOURTH COUNT

FORGERY

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about March 26, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of

this Court, did commit the crime of Forgery, by, with purpose to defraud or injure another, to wit: Mary Kortenhaus and/or Stearns Lending and/or Bank of America and/or New Jersey Title Insurance Company, making, completing, executing, authenticating, issuing or transferring, a writing, to wit: a HUD-1 form and mortgage refinance documents, so that it purported to be the act of Mary Kortenhaus who did not authorize that act, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the Government, and dignity of the same.

SEVENTY FIFTH COUNT

FORGERY

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about July 9, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Forgery, by, with purpose to defraud or injure another, to wit: Daniel LeFante and/or WCS Lending and/or Texas Capital Bank and/or New Jersey Title Insurance Company, making, completing, executing, authenticating, issuing or transferring, a writing, to wit: a HUD-1 form and mortgage refinance documents, so that it purported to be the act of Daniel LeFante who did not authorize that act, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the Government, and dignity of the same.

SEVENTY SIXTH COUNT

FORGERY

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about March 25, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Forgery, by, with purpose to defraud or injure another, to wit: Paul Lowell and/or MLD Mortgage and/or Bank of America and/or New Jersey Title Insurance Company, making completing, executing, authenticating, issuing or transferring, a writing, to wit: a HUD-1 form and mortgage refinance documents, so that it purported to be the act of Paul Lowell who did not authorize that act, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the Government, and dignity of the same.

SEVENTY SEVENTH COUNT

FORGERY

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about February 8, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of

this Court, did commit the crime of Forgery, by, with purpose to defraud or injure another, to wit: Anthony Newell and/or Roman Grutman, Esq. and/or Wells Fargo Bank and/or Chase Bank and/or New Jersey Title Insurance Company, making completing, executing, authenticating, issuing or transferring, a writing, to wit: a HUD-1 form and mortgage refinance documents, so that it purported to be the act of Roman Grutman, Esq. who did not authorize that act, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the Government, and dignity of the same.

SEVENTY EIGHTH COUNT

FORGERY

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO, and JOHN KOSTA, on or about June 11, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Forgery, by, with purpose to defraud or injure another, to wit: Robert Neusch and/or WCS Lending and/or Texas Capital Bank and/or Wells Fargo Bank and/or New Jersey Title Insurance Company, making completing, executing, authenticating, issuing or transferring, a writing, to wit: a HUD-1 form and mortgage refinance documents, so that it purported to be the act of Robert Neusch who did not authorize that act, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the Government, and dignity of the same.

SEVENTY NINTH COUNTFORGERYTHIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about March 15, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Forgery, by, with purpose to defraud or injure another, to wit: Eriberto Ramon and/or Gateway Bank and/or Chase Bank and/or New Jersey Title Insurance Company, making completing, executing, authenticating, issuing or transferring, a writing, to wit: a HUD-1 form and mortgage refinance documents, so that it purported to be the act of Eriberto Ramon who did not authorize that act, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the Government, and dignity of the same.

EIGHTIETH COUNTFORGERYTHIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about October 30, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of

this Court, did commit the crime of Forgery, by, with purpose to defraud or injure another, to wit: Hazel Nunez and/or Ally Bank, making completing, executing, authenticating, issuing or transferring, a writing, to wit: a HUD-1 form and mortgage refinance documents, so that it purported to be the act of Hazel Nunez who did not authorize that act, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the Government, and dignity of the same.

EIGHTY FIRST COUNT

UTTERING A FORGED INSTRUMENT

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D: TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about December 24, 2009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Uttering a Forged Instrument, with purpose to defraud or injure another or with knowledge that a fraud or injury was being facilitated, by uttering to Bank of America and/or Stewart Title Insurance Company a writing, to wit: a HUD-1 statement and mortgage refinance documents pertaining to property owned by Marcia Gonnell, which he knew to be forged, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the Government, and dignity of the same.

EIGHTY SECOND COUNT

UTTERING A FORGED INSTRUMENT

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about March 26, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Uttering a Forged Instrument, with purpose to defraud or injure another or with knowledge that a fraud or injury was being facilitated, by uttering to Bank of America and/or Stearns Lending and/or New Jersey Title Insurance Company a writing, to wit: a HUD-1 statement and mortgage refinance documents pertaining to property owned by Mary Kortenhaus, which he knew to be forged, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the Government, and dignity of the same.

EIGHTY THIRD COUNT

UTTERING A FORGED INSTRUMENT

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about July 9, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court,

did commit the crime of Uttering a Forged Instrument, with purpose to defraud or injure another or with knowledge that a fraud or injury was being facilitated, by uttering to WCS Lending and/or Texas Capital Bank and/or New Jersey Title Insurance Company, a writing, to wit: a HUD-1 statement and mortgage refinance documents pertaining to property owned by Daniel LeFante, which he knew to be forged, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the Government, and dignity of the same.

EIGHTY FOURTH COUNT

UTTERING A FORGED INSTRUMENT

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about March 25, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Uttering a Forged Instrument, with purpose to defraud or injure another or with knowledge that a fraud or injury was being facilitated, by uttering to MLD Mortgage and/or Bank of America and/or New Jersey Title Insurance Company, a writing, to wit: a HUD-1 statement and mortgage refinance documents pertaining to property owned by Paul Lowell, which he knew to be forged, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the Government, and dignity of the same.

EIGHTY FIFTH COUNT

UTTERING A FORGED INSTRUMENT

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about February 8, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Uttering a Forged Instrument, with purpose to defraud or injure another or with knowledge that a fraud or injury was being facilitated, by uttering to Wells Fargo Bank and/or Chase Bank and/or New Jersey Title Insurance Company, a writing, to wit: a HUD-1 statement and mortgage refinance documents pertaining to property owned by Anthony Newell, which he knew to be forged, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the Government, and dignity of the same.

EIGHTY SIXTH COUNT

UTTERING A FORGED INSTRUMENT

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about June 11, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court,

did commit the crime of Uttering a Forged Instrument, with purpose to defraud or injure another or with knowledge that a fraud or injury was being facilitated, by uttering to WCS Lending and/or Texas Capital Bank and/or Wells Fargo Bank and/or New Jersey Title Insurance Company, a writing, to wit: a HUD-1 statement and mortgage refinance documents pertaining to property belonging to Robert Neusch, which he knew to be forged, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the Government, and dignity of the same.

EIGHTY SEVENTH COUNT

UTTERING A FORGED INSTRUMENT

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, - upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA, on or about March 15, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Uttering a Forged Instrument, with purpose to defraud or injure another or with knowledge that a fraud or injury was being facilitated, by uttering to Gateway Bank and/or Chase Bank and/or New Jersey Title Insurance Company, a writing, to wit: a HUD-1 statement and mortgage refinance documents pertaining to property belonging to Eriberto Ramon, which he knew to be forged, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the Government, and dignity of the same.

EIGHTY EIGHTH COUNT

UTTERING A FORGED INSTRUMENT

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO and JOHN KOSTA on or about October 30, 3009, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Uttering a Forged Instrument, with purpose to defraud or injure another or with knowledge that a fraud or injury was being facilitated, by uttering to Ally Bank a writing, to wit: a HUD-1 statement and mortgage refinance documents pertaining to property belonging to Hazel Nunez, which he knew to be forged, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the Government, and dignity of the same.

EIGHTY NINTH COUNT

CONSPIRACY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", SILVANO TROPEANO, JOHN KOSTA and PAUL VOLTAIRE, on or about January 1, 2008 to present within the Township of Holmdel and/or the Township of Manalapan and/or the Township of Aberdeen, County of Monmouth, and elsewhere within the jurisdiction of this Court,

did commit the crime of Conspiracy, by unlawfully agreeing with each other that they, or any one or more of them, would commit the crimes of Impersonation, Forgery and Uttering, with the purpose of promoting or facilitating the commission of said crimes, contrary to the provisions of N.J.S.A. 2C:5-2, N.J.S.A. 2C:21-17a(1), N.J.S.A. 2C:21-1a(2) and N.J.S.A. 2C:21-1a(3), and against the peace of this State, the Government, and dignity of the same.

NINETIETH COUNT

MISCONDUCT BY A CORPORATE OFFICIAL

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that SILVANO TROPEANO, on or about and between January 1, 2008 and July 22, 2010, in or about the Township of Holmdel and/or the Township of Manalapan and/or the Township of Aberdeen, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Misconduct by a Corporate Official, by purposely or knowingly using controlling or operating a corporation, to wit: Hawthorne Capital Corporation, for the furtherance or promotion of a criminal object, thereby deriving a benefit of \$75,000 or more, contrary to the provisions of N.J.S.A. 2C:21-9c, and against the peace of this State, the Government, and dignity of the same.

NINETY FIRST

MISCONDUCT BY A CORPORATE OFFICIAL

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that SILVANO TROPEANO, on or about and between January 1, 2008 and July 22, 2010, in or about Township of Holmdel and/or the Township of Manalapan and/or the Township of Aberdeen, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Misconduct by a Corporate Official, by purposely or knowingly using controlling or operating a corporation, to wit: Hawthorne Abstract, for the furtherance or promotion of a criminal object, thereby deriving a benefit of \$75,000 or more, contrary to the provisions of N.J.S.A. 2C:21-9c, and against the peace of this State, the Government, and dignity of the same.

NINETY SECOND

INSURANCE FRAUD

THIRD DEGREE

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", on or about January 22, 2010, in or about Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Insurance Fraud, by knowingly making or causing to be made a false, fictitious, fraudulent, or misleading statement of material fact in any record or document, to wit: a Certificate of Liability

Insurance form, and submitted or caused to be submitted said form in support of or in connection with a benefit pursuant to an insurance policy or from an insurance company or in an insurance or premium finance transaction, contrary to the provisions of N.J.S.A. 2C:21-4.6, and against the peace of this State, the Government, and dignity of the same.

NINETY THIRD COUNT

FORGERY

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", on or about January 22, 2010, in or about the Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Forgery, by, with purpose to defraud or injure another, to wit: Gateway Bank, making completing, executing, authenticating, issuing or transferring, a writing, to wit: a Certificate of Liability Insurance Form, so that it purported to be the act of New Century Insurance Company, who did not authorize that act, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the Government, and dignity of the same.

NINETY FOURTH

UTTERING A FORGED INSTRUMENT

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK

TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", on or about January 22, 2010, in or about Township of Holmdel and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Uttering a Forged Instrument, with purpose to defraud or injure another or with knowledge that a fraud or injury was being facilitated, by uttering to Gateway Bank a writing, to wit: a Certificate of Liability Insurance, which he knew to be forged, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the Government, and dignity of the same.

NINETY FIFTH

FAILURE TO FILE RETURNS OR REPORTS

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDRICK D. TROPEANO", on or about April 15, 2009 to present, in or about the Township of Holmdel, County of Monmouth, and elsewhere within the jurisdiction of this Court, did commit the crime of Failure to File Returns or Reports, by failing to file any return or report for the tax year 2008, which was required to be filed pursuant to the provisions of any State tax law of the State of New Jersey, with the intent to defraud the State of New Jersey or to evade, avoid or otherwise not make timely payment of any tax, fee, penalty, interest or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure Law or any State tax law, contrary to the provisions of N.J.S.A.

54:52-8, and against the peace of this State, the Government, and dignity of the same.

NINETY SIXTH COUNT

FAILURE TO FILE RETURNS OR REPORTS

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDERICK D. TROPEANO", on or about April 15, 2010 to present, in or about the Township of Holmdel, County of Monmouth, and elsewhere within the jurisdiction of this Court, did commit the crime of Failure to File Returns or Reports, by failing to file any return or report for the tax year 2009, which was required to be filed pursuant to the provisions of any State tax law of the State of New Jersey, with the intent to defraud the State of New Jersey or to evade, avoid or otherwise not make timely payment of any tax, fee, penalty, interest or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure Law or any State tax law, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the Government, and dignity of the same.

NINETY SEVENTH COUNT

FAILURE TO FILE RETURNS OR REPORTS

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDERICK D. TROPEANO", on

or about April 15, 2011 to present, in or about the Township of Holmdel, County of Monmouth, and elsewhere within the jurisdiction of this Court, did commit the crime of Failure to File Returns or Reports, by failing to file any return or report for the tax year 2010, which was required to be filed pursuant to the provisions of any State tax law of the State of New Jersey, with the intent to defraud the State of New Jersey or to evade, avoid or otherwise not make timely payment of any tax, fee, penalty, interest or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure Law or any State tax law, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the Government, and dignity of the same.

NINETY EIGHTH COUNT

FAILURE TO PAY OR TURN OVER TAXES

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDERICK D. TROPEANO", on or about April 15, 2009 to present, in or about the Township of Holmdel, County of Monmouth, and elsewhere within the jurisdiction of this Court, did commit the crime of Failure to Pay or Turn Over Taxes, by failing to pay or turn over when due any tax, fee, penalty or interest or any part thereof for the tax year 2008 which was required to be paid pursuant to the provisions of the State Tax Uniform Procedure Law, or any State tax law, with the intent to evade, avoid or otherwise not make

timely payment or deposit of any tax, fee, penalty or interest or any part thereof, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this State, the Government, and dignity of the same.

NINETY NINTH COUNT

FAILURE TO PAY OR TURN OVER TAXES

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that FREDERICK TROPEANO, a/k/a "DON TROPEANO", a/k/a "FREDERICK D. TROPEANO", on or about April 15, 2010 to present, in or about the Township of Holmdel, County of Monmouth, and elsewhere within the jurisdiction of this Court, did commit the crime of Failure to Pay or Turn Over Taxes, by failing to pay or turn over when due any tax, fee, penalty or interest or any part thereof for the tax year 2009 which was required to be paid pursuant to the provisions of the State Tax Uniform Procedure Law, or any State tax law, with the intent to evade, avoid or otherwise not make timely payment or deposit of any tax, fee, penalty or interest or any part thereof, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this State, the Government, and dignity of the same.

ONE HUNDREDTH COUNT

FAILURE TO PAY OR TURN OVER TAXES

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present FREDERICK TROPEANO,

a/k/a "DON TROPEANO", a/k/a "FREDERICK D. TROPEANO", on or about April 15, 2011 to present, in or about the Township of Holmdel, County of Monmouth, and elsewhere within the jurisdiction of this Court, did commit the crime of Failure to Pay or Turn Over Taxes, by failing to pay or turn over when due any tax, fee, penalty or interest or any part thereof for the tax year 2010 which was required to be paid pursuant to the provisions of the State Tax Uniform Procedure Law, or any State tax law, with the intent to evade, avoid or otherwise not make timely payment or deposit of any tax, fee, penalty or interest or any part thereof, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this State, the Government, and dignity of the same.



PETER E. WARSHAW, JR.
PROSECUTOR
MONMOUTH COUNTY

Endorsed:

Foreperson



New Jersey Judiciary
Plea Form

County Monmouth
Prosecutor File Number 10003528

Defendant's Name: Krista F. Selig
before Judge: Scully

List the charges to which you are pleading guilty:

Ind./Acc./Comp.#	Count	Nature of Offense	Degree	Statutory Maximum		
				Time	Fine	VCCO Assmt*
<u>11-06-1195</u>	<u>32</u>	<u>Conspiracy Amended</u>	<u>3rd</u>	Max <u>5 yrs</u>	<u>\$15K</u>	<u>\$50</u>
				Max		
				Max		
				Max		
				Max		
Your total exposure as the result of this plea is:				Total <u>5 yrs</u>	<u>\$15K</u>	<u>\$50</u>

Please Circle
Appropriate
Answer

2. a. Did you commit the offense(s) to which you are pleading guilty? ☒ Yes ☐ No
- b. Do you understand that before the judge can find you guilty, you will have to tell the judge what you did that makes you guilty of the particular offense(s)? ☒ Yes ☐ No
3. Do you understand what the charges mean? ☒ Yes ☐ No
4. Do you understand that by pleading guilty you are giving up certain rights? Among them are:
- a. The right to a jury trial in which the State must prove you guilty beyond a reasonable doubt? ☒ Yes ☐ No
- b. The right to remain silent? ☒ Yes ☐ No
- c. The right to confront the witnesses against you? ☒ Yes ☐ No
- d. Do you understand that by pleading you are not waiving your right to appeal (1) the denial of a motion to suppress physical evidence (R. 3:5-7(d)) or (2) the denial of acceptance into a pretrial intervention program (PTI) (R. 3:28(g))? ☒ Yes ☐ No
- e. Do you further understand that by pleading guilty you are waiving your right to appeal the denial of all other pretrial motions except the following: ☒ Yes ☐ No

N/A

* Victims of Crime Compensation Office Assessment

5. Do you understand that if you plead guilty:

a. You will have a criminal record?

☒ [Yes] ☐ [No]

b. Unless the plea agreement provides otherwise, you could be sentenced to serve the maximum time in confinement, to pay the maximum fine and to pay the maximum Victims of Crime Compensation Agency Assessment?

☒ [Yes] ☐ [No]

c. You must pay a minimum Victims of Crime Compensation Agency assessment of \$50 (\$100 minimum if you are convicted of a crime of violence) for each count to which you plead guilty? (Penalty is \$30 if offense occurred between January 9, 1986 and December 22, 1991 inclusive. \$25 if offense occurred before January 1, 1986.)

☒ [Yes] ☐ [No]

d. If the offense occurred on or after February 1, 1993 but was before March 13, 1995, and you are being sentenced to probation or a State correctional facility, you must pay a transaction fee of up to \$1.00 for each occasion when a payment or installment payment is made? If the offense occurred on or after March 13, 1995 and the sentence is to probation, or the sentence otherwise requires payments of financial obligations to the probation division, you must pay a transaction fee of up to \$2.00 for each occasion when a payment or installment payment is made?

☒ [Yes] ☐ [No]

e. If the offense occurred on or after August 2, 1993 you must pay a \$75 Safe Neighborhood Services Fund assessment for each conviction?

☒ [Yes] ☐ [No]

f. If the offense occurred on or after January 5, 1994 and you are being sentenced to probation, you must pay a fee of up to \$25 per month for the term of probation?

☒ [Yes] ☐ [No]

g. If the crime occurred on or after January 9, 1997 you must pay a Law Enforcement Officers Training and Equipment Fund penalty of \$30?

☒ [Yes] ☐ [No]

h. You will be required to provide a DNA sample, which could be used by law enforcement for the investigation of criminal activity, and pay for the cost of testing?

☒ [Yes] ☐ [No]

i. Computer Crime Prevention Fund Penalty, N.J.S.A. 2C:43-3.8 (L. 2009, c. 143). If the crime involves a violation of N.J.S.A. 2C:24-4b(5)(b) (knowingly possessing or knowingly viewing child pornography, N.J.S.A. 2C:34-3 (selling, distributing or exhibiting obscene material to a person under age 18) or an offense involving computer criminal activity in violation of any provision of Title 2C, chapter 20, you will be assessed a mandatory penalty as listed below for each offense for which you pled guilty?

☒ [Yes] ☐ [No]

- (1) \$2,000 in the case of a 1st degree crime
- (2) \$1,000 in the case of a 2nd degree crime
- (3) \$ 750 in the case of a 3rd degree crime
- (4) \$ 500 in the case of a 4th degree crime
- (5) \$ 250 in the case of a disorderly persons or petty disorderly persons offense

Total CCPF Penalty

\$

0

6. Do you understand that the court could, in its discretion, impose a minimum time in confinement to be served before you become eligible for parole, which period could be as long as one half of the period of the custodial sentence imposed?

[Yes] [No]

7. Did you enter a plea of guilty to any charges that require a mandatory period of parole ineligibility or a mandatory extended term?

[Yes] [No]

a. If you are pleading guilty to such a charge, the minimum mandatory period of parole ineligibility is ____ years and ____ months (fill in the number of years/months) and the maximum period of parole ineligibility can be ____ years and ____ months (fill in the number of years/months) and this period cannot be reduced by good time, work, or minimum custody credits.

b. If you are pleading guilty to such a charge, the minimum mandatory extended term is ____ years and ____ months (fill in the number of years/months) and the maximum mandatory extended term can be ____ years and ____ months (fill in the number of years/months).

8. Are you pleading guilty to a crime that contains a presumption of imprisonment which means that it is almost certain that you will go to state prison?

[Yes] [No]

9. Are you presently on probation or parole?

[Yes]

[No]

a. Do you realize that a guilty plea may result in a violation of your probation or parole?

[Yes]

[No]

[NA]

10. Are you presently serving a custodial sentence on another charge?

[Yes]

[No]

a. Do you understand that a guilty plea may affect your parole eligibility?

[Yes]

[No]

[NA]

11. Do you understand that if you have plead guilty to, or have been found guilty on other charges, or are presently serving a custodial term and the plea agreement is silent on the issue, the court may require that all sentences be made to run consecutively?

[Yes]

[No]

[NA]

12. List any charges the prosecutor has agreed to recommend for dismissal:

Ind./Acc./Compl.#

Count

Nature of Offense and Degree

13. Specify any sentence the prosecutor has agreed to recommend:

Non-Custodial Probation Conditional upon truthful testimony at trial of co-defendants. If no truthful testimony defendant shall face a maximum sentence of 5 year NTSP (Ft+).

14. Has the prosecutor promised that he or she will NOT:

- a. Speak at sentencing?
- b. Seek an extended term of confinement?
- c. Seek a stipulation of parole ineligibility?

[Yes] ☒ [No]
 [Yes] ☒ [No]
☒ [Yes] [No]

15. Are you aware that you must pay restitution if the court finds there is a victim who has suffered a loss and if the court finds that you are able or will be able in the future to pay restitution?

☒ [Yes] [No] [NA]

16. Do you understand that if you are a public office holder or employee, you can be required to forfeit your office or job by virtue of your plea of guilty?

[Yes] [No] ☒ [NA]

17. a. Are you a citizen of the United States?

☒ [Yes] [No]

If you have answered "No" to this question, you must answer Questions 17b -- 17f. If you have answered "Yes" to this question, proceed to Question 18

b. Do you understand that if you are not a citizen of the United States, this guilty plea may result in your removal from the United States and/or stop you from being able to legally enter or re-enter the United States?

[Yes] [No]

c. Do you understand that you have the right to seek individualized advice from an attorney about the effect your guilty plea will have on your immigration status?

[Yes] [No]

d. Have you discussed with an attorney the potential immigration consequences of your plea? If the answer is "No," proceed to question 17e. If the answer is "Yes," proceed to question 17f.

[Yes] [No]

e. Would you like the opportunity to do so?

[Yes] [No]

f. Having been advised of the possible immigration consequences and of your right to seek individualized legal advice on your immigration consequences, do you still wish to plead guilty?

[Yes] [No]

18. a. Do you understand that pursuant to the rules of the Interstate Compact for Adult Offender Supervision if you are residing outside the State of New Jersey at the time of sentencing that return to your residence may be delayed pending acceptance of the transfer of your supervision by your state of residence?

☒ [Yes] [No]

b. Do you also understand that pursuant to the same Interstate Compact transfer of your supervision to another state may be denied or restricted by that state at any time after sentencing if that state determines you are required to register as a sex offender in that state or if New Jersey has required you to register as a sex offender?

☒ [Yes] [No]

19. Have you discussed with your attorney the legal doctrine of merger?

[Yes] [No] ☒ [NA]

20. Are you giving up your right at sentence to argue that there are charges you pleaded guilty to for which you cannot be given a separate sentence? [Yes] [No] ☒ [NA]

21. List any other promises or representations that have been made by you, the prosecutor, your defense attorney, or anyone else as a part of this plea of guilty:

My attorney will argue for a Civil Reservation and
appeal any PTI rejection by way of motions.

22. Have any promises other than those mentioned on this form, or any threats, been made in order to cause you to plead guilty? [Yes] ☒ [No]

23. a. Do you understand that the judge is not bound by any promises or recommendations of the prosecutor and that the judge has the right to reject the plea before sentencing you and the right to impose a more severe sentence? ☒ [Yes] [No]

b. Do you understand that if the judge decides to impose a more severe sentence than recommended by the prosecutor, that you may take back your plea? ☒ [Yes] [No]

c. Do you understand that if you are permitted to take back your plea of guilty because of the judge's sentence, that anything you say in furtherance of the guilty plea cannot be used against you at trial? ☒ [Yes] [No]

24. Are you satisfied with the advice you have received from your lawyer? ☒ [Yes] [No]

25. Do you have any questions concerning this plea? ☒ [Yes] ☒ [No]

Date 3/29/12 Defendant [Signature]

Defense Attorney [Signature]

Prosecutor [Signature]

[] This plea is the result of the judge's conditional indications of the maximum sentence he or she would impose independent of the prosecutor's recommendation. Accordingly, the "Supplemental Plea Form for Non-Negotiated Pleas" has been completed.

STATE OF NEW JERSEY v. KRISTA F. SELIG
INDICTMENT NO. 11-06-1195

MEMORANDUM OF UNDERSTANDING
BETWEEN THE MONMOUTH COUNTY PROSECUTOR'S OFFICE
AND
KRISTA F. SELIG

It is hereby agreed and understood by and between the Monmouth County Prosecutor's Office, through Counsel, Assistant Monmouth County Prosecutor John Loughrey and Krista F. Selig, through Counsel Raymond Santiago as follows:

1. Krista F. Selig was charged in Indictment No. 11-06-1195 with second degree Conspiracy to commit Theft on or about January 1, 2008 through July 21, 2010, in and around the Township of Matawan and/or the Township of Manalapan.
2. Krista F. Selig will cooperate fully with the Monmouth County Prosecutor's Office in the prosecution surrounding the Financial Facilitation of Criminal Activity, Conspiracy, Theft, Attempted Theft, Impersonation, Forgery, Uttering, Misconduct by Corporate Official and Insurance Fraud, Failure to File Returns or Report and Failure to Pay or Turn Over Taxes of co-defendants John Kosta, Elektra Tropeano, Frederick Tropeano, Silvano Tropeano, Harry Voltaire and/or Paul Voltaire. That cooperation will include disclosure by Krista F. Selig of all relevant information concerning the activities of John Kosta, Elektra Tropeano, Frederick Tropeano, Silvano Tropeano, Harry Voltaire and/or Paul Voltaire, which resulted in any over the above-described crimes. Krista F. Selig will permit an unrestricted interview by attorneys and/or detectives from the Monmouth County Prosecutor's Office as requested.
3. Krista F. Selig will cooperate and testify truthfully when called as a witness in the petit jury proceedings against John Kosta, Elektra Tropeano, Frederick Tropeano, Silvano Tropeano, Harry Voltaire and/or Paul Voltaire regarding the events which resulted in the criminal offenses outlined in Paragraph 2.
4. In the event that Krista F. Selig testifies falsely under oath, this agreement is null and void and Krista F. Selig will be prosecuted for perjury and/or

State of New Jersey v. Krista F. Selig
Memorandum of Understanding
Page 2

false swearing in addition to the more serious crimes of the indictment as originally charged.

5. If, in the reasonable opinion of the Monmouth County Prosecutor's Office, Krista F. Selig breaches any condition of this agreement, the State shall present the alleged breach to a judge of the Superior Court who will determine whether that breach exists. If the breach is found to be material, the agreement shall be declared null and void and any information provided by Krista F. Selig either through interview, statement and/or testimony shall be admissible in any prosecution against Krista F. Selig for the aforementioned charges against her.
6. It is the expectation of the Monmouth County Prosecutor's Office and Krista F. Selig through Counsel, Raymond Santiago, Esq. that the cooperation provided by Krista F. Selig through interview, statement and testimony could include admissions as to other crimes which arose out of Krista F. Selig's association with John Kosta, Elektra Tropeano, Frederick Tropeano, Silvano Tropeano, Harry Voltaire and/or Paul Voltaire. It is hereby agreed between the parties that any such information divulged by Krista F. Selig shall not be used in the prosecution of Krista F. Selig for those crimes, inasmuch as those crimes are deemed to have been committed during the association of Krista F. Selig with John Kosta, Elektra Tropeano, Frederick Tropeano, Silvano Tropeano, Harry Voltaire and/or Paul Voltaire as part of the conduct leading up to her involvement in the Financial Facilitation of Criminal Activity, Conspiracy, Theft, Attempted Theft, Impersonation, Forgery, Uttering, Misconduct by Corporate Official and Insurance Fraud, Failure to File Returns or Report and Failure to Pay or Turn Over Taxes on or about January 1, 2008 through July 21, 2010, in and around the Township of Matawan and/or the Township of Manalapan.
7. It is agreed upon by all parties that Krista F. Selig will enter a plea of guilty to the crime of Conspiracy to Commit Theft, Count Thirty Two in the Indictment. The State will amend this charge from a second degree crime to a third degree crime as a condition of this agreement. Said plea is full satisfaction for any criminal conduct she may be exposed to in this prosecution. In exchange for the plea, Krista F. Selig will receive from the Prosecutor's Office an agreement to recommend a minimum term of non-custodial probation to a maximum term of five (5) years New Jersey State Prison. This recommendation would be in exchange for Krista F. Selig's plea conditioned upon her agreement to testify truthfully against John Kosta, Elektra Tropeano, Frederick Tropeano, Silvano Tropeano, Harry Voltaire and/or Paul Voltaire and cooperate with the State during the full prosecution of John Kosta, Elektra Tropeano, Frederick Tropeano, Silvano Tropeano, Harry Voltaire and/or Paul Voltaire (i.e. trial preparation). The

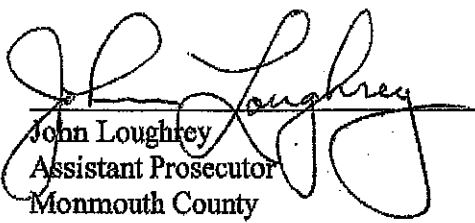
State of New Jersey v. Krista F. Selig
Memorandum of Understanding
Page 3

State also agrees to inform the sentencing judge as to the cooperation by Krista F. Selig in this matter.

8. There are no other agreements or understandings other than in the plea form itself.



Raymond Santiago, Esq.
Attorney for Krista F. Selig



John Loughrey
Assistant Prosecutor
Monmouth County

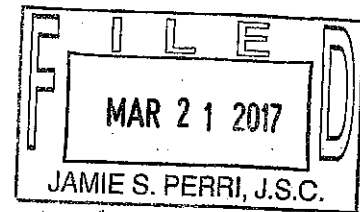


Krista F. Selig
Defendant

Detective Arnaldo Maestrey
Monmouth County Prosecutor's Office

EXHIBIT B

JOSE RIVERA-BENITEZ, ESQ. (Attorney No. 020361983)
SHAIN, SCHAFFER & RAFANELLO, P.C.
150 MORRISTOWN ROAD - SUITE 105
BERNARDSVILLE, NEW JERSEY 07924
(908) 953-9300/(908) 953-2969 (fax)



JPMORGAN CHASE BANK, N.A.,

Plaintiff,

v.

HAWTHORNE CAPITAL CORP.;
HAWTHORNE ABSTRACT CORP.;
SILVANO TROPEANO; FREDERICK
"DON" TROPEANO; JOHN KOSTA;
ELEKTRA TROPEANO a/k/a ELEKTRA
MANGAS; LISA PALERMO; RAPID
ABSTRACT, LLC; KRISTA SELIG; THE
SELIG LAW GROUP, P.C.; GATEWAY
BANK F.S.B.; NEW JERSEY TITLE
INSURANCE COMPANY; JOHN DOES 1-
10 and XYZ CORPS. 1-10,

Defendants,

LISA PALERMO & RAPID ABSTRACT,
LLC,

Third-Party Plaintiffs,

v.

IPA RISK MANAGEMENT, LLC &
CHASE HEITMANN,

Third-Party Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
MONMOUTH COUNTY

Docket No.: MON-L-4617-10

Civil Action

**ORDER OF DEFAULT JUDGMENT ON
LIABILITY AND DAMAGES**

THIS MATTER having been opened to the Court by Shain, Schaffer & Rafanello, P.C.,
attorneys for Plaintiff, JPMorgan Chase Bank, N.A. ("Chase"), for the entry of Default Judgment

against Defendants Hawthorne Capital Corp., Hawthorne Abstract Corp., Silvano Tropeano, Frederick Tropeano, John Kosta; Elektra Tropeano a/k/a Elektra Mangas, Krista Selig, and The Selig Law Group, P.C., and the Court having considered the matter in controversy and the evidence submitted, and for good cause shown;

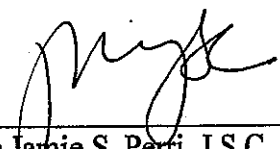
IT IS on this 21st day of March, 2017, 2016,

ORDERED, as follows:

1. Default judgment as to liability and damages in the amount of \$2,684,682.79 is hereby entered in favor of Chase against Defendants Hawthorne Capital Corp., Hawthorne Abstract Corp., Silvano Tropeano, Frederick Tropeano, John Kosta; ~~Elektra Tropeano a/k/a Elektra Mangas~~, Krista Selig, and The Selig Law Group, P.C., and
2. Pursuant to N.J.S.A. 2C:41-4 (c), Chase is entitled to treble damages and costs of suit, including reasonable attorneys' fees, costs of investigation and litigation;
3. A true copy of this Order shall be served upon Defendants Hawthorne Capital Corp., Hawthorne Abstract Corp., Silvano Tropeano, Frederick Tropeano, John Kosta; ~~Elektra Tropeano a/k/a Elektra Mangas~~, Krista Selig, and The Selig Law Group, P.C., within 7 days of the date hereof.

Findings of the Court were set forth
on record on 11/30/16.

*and supplemented
by the Order attached
hereto*



Honorable Jamie S. Perri, J.S.C.

RIDER TO ORDER DATED 3/21/17

JPMorgan Chase Bank, N.A. v. Hawthorne Capital Corp., et al.
Docket No. MON-L-4617-10

The court makes the following findings of fact and conclusions of law regarding the motion identified in the attached Order:

This matter came before the court on a proof hearing on 11/30/16. At that time, the court entered judgment against defendants Hawthorne Capital Corp., Hawthorne Abstract Corp., John Kosta and Frederick "Don" Tropeano. The claims against Elektra Tropeano were dismissed. The court granted plaintiff leave to supplement the record to submit additional proofs regarding the conviction and sentencing of defendants Silvano Tropeano and Krista Selig and to connect the indictment to the pleas that were entered. On December 16, 2016, plaintiff submitted the certification of Jose Rivera-Benitez, Esq., which accompanied documents associated with the criminal matters involving the defendants, including a complete copy of the indictment and the plea forms executed by Selig and Silvano Tropeano together with their accompanying memoranda of understanding. Selig and Tropeano each pleaded guilty to Count 32 of the indictment as amended to 3rd degree conspiracy to commit theft.

The court incorporates by reference its statements and findings placed on the record on 11/30/16 and supplements the record as follows.

The court has reviewed the supplemental documents and finds that they provide adequate support of plaintiff's claim against Silvano Tropeano, Krista Selig and the Selig Law Group, P.C., and default judgment for compensatory damages is entered against them.

In order to establish standing to pursue a RICO claim pursuant to N.J.S.A. 2C:41-4(c) et seq., the plaintiff must show its harm "was proximately caused by the RICO predicate acts alleged, i.e., that there was a direct relationship between plaintiff's injury and defendant's conduct." Interchange State Bank v. Veglia, 286 N.J. Super. 164, 178 (App. Div. 1995). This requires a showing not only that the defendant's alleged RICO violation was the "but for" cause or cause-in-fact of his injury, but also that the violation was the legal or proximate cause. Id.; See also, Holmes v. Securities Investor Protection Corp., 503 U.S. 258, 265, 112 S.Ct. 1311, 1316-18 (1992).

The court further find that the totality of the proofs presented support a finding that the plaintiff has proven its NJRICO claims against defendants Hawthorne Capital Corp., Hawthorne Abstract Corp., John Kosta, Frederick "Don" Tropeano, Silvano Tropeano, Krista Selig and the Selig Law Group.



 JAMIE S. PERRI, J.S.C.